

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COOKEVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 2:21-00008
)	
WILLIAM L. DONALDSON)	

**DEFENDANT WILLIAM DONALDSON’S MOTION TO APPOINT CO-COUNSEL
FROM THE CRIMINAL JUSTICE ACT**

The defendant, William L. Donaldson, is charged in Counts 1, 2, and 7 in the Indictment in this case with conspiracy to distribute and dispense controlled substances, conspiracy to commit healthcare fraud, and a conspiracy to defraud the United States. The factual allegations relate to the operation of pharmacies in the Middle District of Tennessee either owned, operated, or worked in by the defendants over a five-year period ending in 2019. Discovery provided by the Government is massive and complex, including more than 2.25 million documents. Defendant Donaldson seeks the appointment as co-counsel of lawyers from a private firm in Nashville who have significant experience and expertise in the investigation and litigation of claims of healthcare fraud. Their expertise would be of great help to current counsel. Their experience and the experience of their support staff in the management and analysis of the discovery would enhance the quality of representation provided the defendant Donaldson. It would also make the discovery review and analysis, the defense investigation and case preparation more efficient and timelier. Although proposed co-counsel are not members of the CJA panel of this district, their appointment is within the authority of the Court under Section X.B.3. of the Criminal Justice Act Plan of this district. Undersigned counsel is ready to provide the Court with any additional information needed by the Court to resolve this motion.

Respectfully submitted,

/s/ Henry A. Martin

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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2022, I electronically filed the foregoing *Defendant Donaldson's Motion to Appoint Co-Counsel from the Criminal Justice Act* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Amanda J. Klopf and Sarah K. Bogni, Assistant United States Attorney, 110 Ninth Avenue South, Suite A961, Nashville, Tennessee, 37203.

/s/ Henry A. Martin

HENRY A. MARTIN